Applicant: Aurobinda Pradhan Attorney's Docket No.: 15609-044001 / 2003P00966

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REMARKS

In response to the office action dated March 5, 2007, Applicant is amending claims 1-5, 7-8, 11, 12, 14-17 and 19-20. As such, claims 1-20 are pending, of which claims 1, 12 and 14 are independent. Applicant submits that the claims as amended are allowable over the prior art of record.

The independent claims are being amended as follows. Claim 1 is amended to recite "several types of intrinsic associations" and that "the types of intrinsic associations includ[e] at least a first intrinsic association type where the selected electronic document is a follow-up of the other electronic document, and a second intrinsic association type where the other electronic document is a follow-up of the selected electronic document". Moreover, claim 1 is amended to recite that the user-selectable command is included in an input control and that "the input control [is] displayed separately from the selected electronic document in the graphical user interface and configured for being used with any of multiple electronic documents displayed in the graphical user interface". Claim 1 is also amended to recite that the user-selectable command identifies the intrinsic association by "stating" which of the documents is a follow up of the other.

Support for these amendments is found throughout the present disclosure. For example, it is described with reference to Figures 1A-D that a menu 160 can include commands under an "Is a Follow-Up of:" heading and/or under an "Associated Follow-Up:" heading. Specification, page 6, lines 8-22. Specifically, the menu 160 "groups the associated electronic documents in two categories" (Specification 6:11-12) according to the type of intrinsic association (e.g., the type that identifies the present document as being a follow-up, or the type that identifies another document as being a follow-up). Moreover, the commands for displaying any associated document in this example are part of an input control with which the user can activate any or all of them (e.g., a command 170) to display the corresponding document. Specification 6:23. Also, the input control is included in a toolbar 130 and configured for use with multiple documents displayed in a document display area 110. Specification 5:19-6:15. Finally, Figure 1B shows that the menu 160 states which of the documents is a follow-up of the other.

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Specification, page 6, lines 8-22. Similar changes are made in independent claims 12 and 14, which are also amended to recite a "computer-readable medium" instead of an "information carrier". Also, corresponding changes are made in some dependent claims. No new matter is added.

Claims 12-20 were rejected under § 101 as allegedly being directed to non-statutory subject matter, due to the phrase "information carrier" in the preamble. Without conceding that the rejection has merit, Applicant has amended the independent claims to instead recite a "computer-readable medium" and request that the rejection be removed on this basis.

Claims 1-3 and 9-16 were rejected as allegedly being unpatentable over U.S. 6,313,855 (Shuping) in view of U.S. 20020011990 (Anwar). Claims 4-8 and 17-20 were rejected as allegedly being unpatentable over Shuping and Anwar in view of U.S. 5,895,470 (Pirolli). These rejections are rendered moot by the above amendments but Applicant is not conceding that the rejections have merit. Nevertheless, Applicant provides the following comments on differences between the present subject matter and the prior art of record.

The claims as amended recite that there are several types of intrinsic associations, including: (i) a first intrinsic association where the selected electronic document is a follow-up of another document, and (ii) a second intrinsic association where the other document is a follow-up of the selected document. Moreover, a user-selectable command for displaying a document having any of the intrinsic associations with the present document is included in an input control that is displayed separately from the selected document in the user interface and that can be used with any of multiple displayed documents. Also, the user-selectable command states which of the electronic documents is a follow-up of the other.

Shuping and Pirolli are taken as characterized in Applicant's response to a previous office action. Anwar discloses manipulation and viewing of digital documents, particularly as shown in Figure 9 where a floating thumbnail document 110 shows a view of a page to which there is a link on a document 100. [Anwar 0053.]

Even if the teachings of Shuping and Anwar were combined, they fail to anticipate or render obvious the intrinsic associations recited in the present independent claims. Shuping

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discloses hyperlinks from one page to another but not in form of a follow-up document, and therefore does not teach even one of the several types of associations recited herein. Moreover, Shuping's hyperlinks are included in the pages and as such fail to show the input control that is separate from the document, and that is usable with several documents, as the present claims recite. Finally, Shuping does not show a user-selectable command that states which of the electronic documents is a follow-up of the other.

Anwar does not make up this deficiency. This is because Anwar also fails to anticipate or render obvious even one of the intrinsic associations recited in the present independent claims. Moreover, Anwar's links are included in the pages and as such fail to show the input control that is separate from the document, and that is usable with several documents, as the present claims recite. Finally, Anwar does not show a user-selectable command that states which of the electronic documents is a follow-up of the other.

Pirolli was cited as allegedly showing "a plurality of association categories" but in reality does not. That is, in terms of the claims as presently amended, Pirolli does not teach or render obvious the several types of intrinsic associations recited in the present claims. This is because Pirolli deals with categorizing pages that are already connected by links. *See, e.g.*, Pirolli Abstract (stating that information "from a collection of *linked* documents" is extracted and analyzed "to enable categorization") (emphasis added). As such, the links are not several types of intrinsic associations, because Pirolli performs the categorization after the links are created. Particularly, Pirolli fails to show or render obvious the first and second intrinsic associations between documents according to the present claims.

Conclusion

Applicants submit that the claims 1-20 are in condition for allowance, and request favorable consideration of these claims.

It is believed that all of the pending claims have been addressed. However, the absence of a reply to a specific rejection, issue or comment does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above

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may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

This response is filed within the shortened statutory period and no fee is therefore due. Please apply any other charges or credits to deposit account 06-1050.

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Respectfully submitted,

Reg. No. 43,352